

## Exhibit 3

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FRANCESCO GALLO,

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Plaintiff,

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-against-

Case No.

07CV06418 (CM) (HP)

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ALITALIA-LINEE AEREE ITALIANE-

SOCIETA PER AZIONI, PIERANDREA GALLI,

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and GIULIO LIBUTTI,

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Defendants.

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DEPOSITION OF ANDREA PORRU

New York, New York

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Wednesday, March 12, 2008

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Reported by: CAPRICE LATHE

Job No.: 10350

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1 A. PORRU

2 people there is a severance.

3 Q Was this something that was offered to  
4 everyone in Germany?

5 A No. It depends on the role of the -- in  
6 the company. So the basis of the plan was  
7 reorganization. Changing some business.

8 Also, organization change and some  
9 positions were eliminated due to a big outsourcing  
10 in the market of certain function and activities.

11 Q Are you aware of any early retirement plan  
12 in Alitalia North America?

13 A Yes. I am aware they put into place in  
14 2004 and 2005.

15 Q And who put that into place?

16 A I think Mr. Gallo.

17 Q And why?

18 MR. KORAL: Objection.

19 A I was not here, so I think it was the same  
20 reason, because the company was close to bankruptcy,  
21 and then it was a rescue plan in place worldwide.

22 Q And was that a plan to eliminate some  
23 older workers?

24 A No.

25 MR. KORAL: Objection.